

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

PRINCETON DIGITAL IMAGE	)	
CORPORATION,	)	
	)	
Plaintiff,	)	Case No. 13-238 (LPS)
	)	
v.	)	JURY TRIAL DEMANDED
	)	
DELL INC.,	)	
	)	
Defendant.	)	

**STIPULATION AND ORDER**

WHEREAS, the Court issued a Scheduling Order on October 10, 2014 that governed the schedule of the above-captioned matter (the “Scheduling Order”, D.I. 32);

WHEREAS the Scheduling Order included deadlines permitting the parties to conduct early discovery pertaining to laches (*See* Scheduling Order, ¶8a);

WHEREAS the Scheduling Order also permitted the parties to file early summary judgment motions with respect to laches (*See* Scheduling Order, ¶17a); and

WHEREAS, the parties require additional time to conduct early discovery pertaining to laches and to submit early summary judgment motions with respect to laches.

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that the deadlines set forth in the Scheduling Order be amended as follows:

Action	Current Deadline	Proposed Deadline
Document Production Complete <sup>*</sup>	N/A	January 9, 2015

<sup>\*</sup> The parties currently have discovery disputes that will be raised with the Court on December 18, 2014. Both parties preserve their respective positions, and agree that this Stipulation and Order does not alter or waive each party’s respective position on those disputes — unless and until decided by the Court.

Early Discovery Ends <sup>†</sup>	November 17, 2014	February 6, 2015
Opening Brief regarding Early Summary Judgment related to laches	December 2, 2014	February 20, 2015
Answering Brief regarding Early Summary Judgment related to laches	December 16, 2014	March 6, 2015
Reply Brief regarding Early Summary Judgment related to laches	December 30, 2014	March 20, 2015
Oral Argument regarding Early Summary Judgment related to laches	February 10, 2014 at 9:00 a.m.	TBD

O'KELLY ERNST &amp; BIELLI, LLC

DRINKER BIDDLE &amp; REATH LLP

/s/ Sean T. O'Kelly

Sean T. O'Kelly (#4349)  
Daniel P. Murray (#5785)  
901 North Market St., Ste. 1000  
Wilmington, DE 19801  
(302) 778-4000  
sokelly@oeblegal.com  
dmurray@oeblegal.com

*Attorneys for Plaintiff Princeton  
Digital Image Corporation*

/s/ Francis DiGiovanni

Francis DiGiovanni (#3189)  
222 Delaware Ave., Ste. 1410  
Wilmington, DE 19801  
(302) 467-4200  
Francis.DiGiovanni@dbr.com

*Attorneys for Defendant Dell Inc.*

SO ORDERED this \_\_\_\_\_ day of December, 2014.

---

UNITED STATES DISTRICT JUDGE

---

<sup>†</sup> The parties repeat and incorporate by reference the previous footnote with respect to the End of Early Discovery.